

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

IN RE: ETHICON, INC. PELVIC REPAIR
SYSTEMS PRODUCTS LIABILITY
LITIGATION

Master File No. 2:12-MD-02327
MDL 2327

ETHICON WAVE 8 CASES LISTED IN
EXHIBIT A

JOSEPH R. GOODWIN U.S. DISTRICT
JUDGE

**NOTICE OF ADOPTION OF PRIOR DAUBERT MOTION OF
STEPHEN M. FACTOR, M.D. FOR WAVE 8**

Comes now, the Plaintiffs, and hereby adopt and incorporate by reference the Daubert motion filed against Stephen M. Factor for Ethicon Wave 1, Dkt. 2015 (motion), 2020 (memorandum in support). Plaintiffs respectfully request that the Court exclude Stephen M. Factor's testimony, for the reasons expressed in the Wave 1 briefing. This notice applies to the following Wave 8 cases identified in Exhibit A attached hereto.

Dated: October 15, 2018

Respectfully submitted,

/s/ D. Renee Baggett

Renee Baggett, Esq.
Bryan F. Aylstock, Esq.
Aylstock, Witkin, Kreis and Overholtz, PLC
17 East Main Street, Suite 200
Pensacola, Florida 32563
(850) 202-1010
(850) 916-7449 (fax)
E-mail: rbaggett@awkolaw.com

/s/ Thomas P. Cartmell

THOMAS P. CARTMELL
Wagstaff & Cartmell LLP
4740 Grand Avenue, Suite 300
Kansas City, MO 64112
816-701-1102
Fax 816-531-2372
tcartmell@wcllp.com

EXHIBIT A

Duffy, Dawn	2:17-cv-04476
Bernard, Elva	2:13-cv-02932
Castro, Leonor & Anselmo	2:14-cv-29620
Clemons, Debra & Karry	2:15-cv-02655
Hall, Linda & Howard	2:13-cv-02931
Howton, Beverly	2:16-cv-02536
Kessler, Joyce R. & Allan	2:13-cv-01211
Kinard, Christine	2:14-cv-29115
McCaffrey, Elizabeth	2:12-cv-09706
Vanconcelos, Francesca & Rui	2:14-cv-07706
Yetter, Jean M.	2:15-cv-01599
Gossen, Jeanne	2:17-cv-03184
Reeder, Debbie	2:15-cv-12422

CERTIFICATE OF SERVICE

I hereby certify that on October 15, 2018, I electronically filed the foregoing document with the Clerk of the court using CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

/s/ D. Renee Baggett
D. RENEE BAGGETT
Aylstock, Witkin, Kreis and Overholtz, PLC
17 E. Main Street, Suite 200
Pensacola, FL 32563
850-202-1010
850-916-7449
Rbaggett@awkolaw.com